

STATE OF INDIANA ) IN THE HAMILTON \_\_\_\_\_ COURT  
 ) SS:  
 COUNTY OF HAMILTON ) CAUSE NO. 29D01-  
  
 JON PLUMMER, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 BILL DITTMER and )  
 BILL DITTMER TRUCKING, INC. )  
 )  
 Defendant. )

### **PLAINTIFF'S COMPLAINT FOR DAMAGES**

Plaintiff Jon Plummer, by counsel, for his Complaint for Damages against the Defendants, Bill Dittmer and Bill Dittmer Trucking, Inc., alleges and states as follows:

1. The Plaintiff, Jon Plummer ("Plummer"), is a resident of Anderson, Indiana.
2. The Defendant, Bill Dittmer ("Dittmer"), is a resident of Madison, Maine.
3. The Defendant, Bill Dittmer Trucking, Inc. ("Dittmer Trucking"), is a Delaware corporation authorized to do business in Indiana.
4. On December 11, 2020, Plummer was parked in his vehicle on the right shoulder of Interstate 69, facing northbound, in Fishers, Indiana.
5. At the same time, Dittmer, while in the course and scope of his employment with Dittmer Trucking, was traveling northbound on Interstate 69, in Fishers, Indiana, operating a commercial truck owned by Dittmer Trucking.
6. While Plummer was parked well off the roadway, Dittmer crossed his truck over the solid white line and crashed into the driver's side of Plummer's vehicle.
7. Dittmer's conduct, which occurred in the course and scope of his employment with

Dittmer Trucking, was negligent and/or in violation of state and federal law constituting negligence per se.

8. As a result of the Defendants' negligence and/or negligence per se, Plummer suffered physical and emotional injuries, has experienced and will in the future experience pain and suffering, has incurred and will in the future incur medical expenses for his care and treatment, and has suffered other compensable damages, including but not limited to the inability to function as a whole person.

WHEREFORE, Plaintiff Jon Plummer, by counsel, respectfully requests that judgment be entered in his favor in an amount to be proven at trial and for all other relief proper in the premises.

HOVDE DASSOW & DEETS LLC

By /s/ Robert T. Dassow  
Robert T. Dassow, #15145-64  
Tyler J. Zipes, #35081-49

**JURY DEMAND**

The Plaintiffs, by counsel, respectfully request trial by jury.

HOVDE DASSOW & DEETS LLC

By /s/ Robert T. Dassow  
Robert T. Dassow, #15145-64  
Tyler J. Zipes, #35081-49